

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.

Defendants.

Case No. 1:23-cv-06188-ER

JOINT EXHIBIT LIST

| Witness | FTC | Defendants |
|------------------------------------|-------------|--------------------------------------|
| Day 1 - 11/20/2023 | | |
| | FTC Opening | Defendants' Opening (D-IQVIA-DEMO-1) |
| Justin Freid - CMI | | DX0049 |
| | | WPP Annual Report & Accounts 2022 |
| | | DSPs Used by CMI (D-FREID-DEMO-2) |
| | | |
| Konrad Gerszke - PulsePoint | | DX0066 |
| | | Pulsepoint slides (D-GERSZKE-DEMO-1) |
| | | DX1852 |
| | | DX1924 |
| | | DX1928 |
| | | DX1929 |
| | | |
| Day 2- 11/21/2023 | | |
| David Leitner - Klick | | DX1664 |
| | | |
| Michael Colarossi - IQVIA | PX1625 | |
| | PX1628 | |
| | PX1901 | |
| | | |
| Frank Lin - IQVIA | PX1026 | DX0583 |
| | PX1126 | CMS.gov (D-LIN-DEMO-1) |
| | PX1254 | CMS.gov (D-LIN-DEMO-2) |

| Witness | FTC | Defendants |
|--|--|---|
| | PX1284 | DMD HCP Audience Partners (D-LIN-DEMO-3) |
| | PX1962 | IQVIA HCP Audience Partners (D-LIN-DEMO-4) |
| | PX1981 | Stages Of Programmatic Advertising (D-LIN-DEMO-5) |
| | PX2775 | Different Types of Advertising Inventory (D-LIN-DEMO-6) |
| | PX2779 | Providers of Opted-In HCP Data (D-LIN-DEMO-7) |
| | PX2780 | |
| | | |
| Ross Sandler - DeepIntent | PX2736 | |
| | PX2750 | |
| | | |
| Plaintiff Witness: Ekaterina Karlova – EMD Serono | Joint Video Clip of Ekaterina Karlova - EMD Serono | |
| | | |
| | | |
| Day 3- 11/22/2023 | | |
| Mark Brosso - PurpleLab | FTC - Purple Lab Timeline | HCP/DTC/Measurement - PurpleLab (D-MB-1) |
| | | DSPs - PurpleLab (D-MB-2) |
| | | Data Companies - PurpleLab (D-MB-3) |
| | | PurpleLab Everywhere (D-MB-4) |
| | | PurpleLab Timeline - Edits (D-MB-5) |
| | | |
| Defendant Witness: William Veltre - BMS | Joint Clip Report of William Veltre - BMS | |
| | | |
| | | |
| Jay Margolis – Former IQVIA | PX0008 | PX1091 |
| | PX1259 | DX0082 |
| | PX1349 | DX0083 |
| | PX1377 | |
| | FTC Demonstrative | |
| | | |
| Day 4- 11/27/2023 | | |
| Greg Field - IQVIA | DX0581 | DX0103 |
| | DX0675 | DX0581 |
| | PX1062 | DX0617 |
| | PX1064 | DX0660 |
| | PX1069 | DX0667 |
| | PX1433 | DX0675 |
| | PX1439 | DX0677 |
| | PX1450 | DX0678 |
| | PX1451 | DX0753 |
| | PX1606 | DX0764 |
| | PX5152 | DX2033 |
| | PX5156 | DX2035 |
| | PX5286 | |
| | | |

| Witness | FTC | Defendants |
|--|----------------------------|---|
| | | |
| Asaf Evenheim -Veeva | PX0081 | DX0115 |
| | | Table of Top Participants in IQVIA's TPA Program 2018-2023 (D-VEEVA-DEMO-1) |
| | | DX1993 |
| | | DX2020 |
| | | DX2021 |
| | | DX2042 |
| | | DX2059 |
| | | |
| | | |
| Chris Paquette - DeepIntent | PX2507 | DX0220 |
| | PX2508 | DX0332 |
| | PX2515 | DX0373 |
| | PX2519 | DX2034 |
| | PX2520 | PX2509 |
| | PX2559 | PX2507 |
| | PX2804 | PX2508 |
| | PX2809 | PX2515 |
| | PX2812 | PX2520 |
| | PX2816 | PX2809 |
| | PX2847 | PX2812 |
| | PX5121 | Chris Paquette - DeepIntent Product Offerings (D-DEMO-CP-1) |
| | PX5174 | |
| | | |
| Day 5- 11/28/2023 | | |
| Khara Hutchinson - Bayer | | Bayer Low Dose Aspirin Demonstrative (D-BAYER-DEMO-1) |
| | | Children's Claritin Demonstrative (D-BAYER-DEMO-2) |
| | | MiraLAX Demonstrative (D-BAYER-DEMO-3) |
| | | |
| Baron Harper – The Trade Desk | PX1733 | DX0510 |
| | PX4083 | DX0518 |
| | PX4086 | DX0528 |
| | | DX0614 |
| | | DX1604 |
| | | DX2091 |
| | | DX2092 |
| | | DX2093 |
| | | DX2094 |
| | | DX2097 |
| | | DX2098 |
| | | DX2099 |
| | | DX2100 |
| | | DX2101 |
| James Lawson - AdTheorent | PX4088 | |
| | | |
| Kostis Hatzitaskos - FTC Expert | FTC - ELMO Demo re Figures | |

| Witness | FTC | Defendants |
|---|--|--|
| | FTC Demonstratives Kostis Hatzitaskos | |
| | | |
| Day 6 - 11/29/2023 | | |
| Kostis Hatzitaskos (Cross) | | DX0066 |
| FTC Expert | | DX0074 |
| | | DX0078 |
| | | DX1703 |
| | | DX1889 |
| | | DX1924 |
| | | DX1929 |
| | | DX2020 |
| | | DX2035 |
| | | DX2059 |
| | | DX2069 |
| | | FTC Complaint |
| | | Hearing Transcript Day 1 |
| | | Dr. Hatzitaskos' demonstrative |
| | | |
| Andrea Palmer - Publicis | | |
| | | |
| | | |
| Yael Hochberg - Defendants' Expert | | Yael Hochberg Demonstratives (D-HOCHBERG-DEMO-1 C) |
| | | |
| | | |
| Defendant Witness: Justin Chase - Eversana | PX2938 (used in video) | |
| | Joint Clip Report of Justin Chase - Eversana | |
| | | |
| Defendant Witness: Paul Chachko - Throtle | PX4160 (used in video) | |
| | Joint Clip Report of Paul Chachko - Throtle | |
| | | |
| Day 7- 11/30/2023 | | |
| Mark Israel - Defendants' Expert | PX0572 | |
| | PX1024 | |
| | FTC Dr. Israel Cross Examination | Dr. Mark A. Israel's demonstrative (D-ISRAEL-DEMO-1) |
| | | |
| Plaintiff Witness: Arif Nathoo - Komodo | Joint Clip Report of Arif Nathoo - Komodo | |
| | | |
| | | |
| Andrew Kress – HealthVerity | | |
| | | |
| Day 8- 12/1/2023 | | |
| Defendant Witness: Sam Temes - Google | PX0009 (used in video) | |

| Witness | FTC | Defendants |
|---|---|--|
| | PX4090 (used in video) | DX0548 (used in video) |
| | PX4092 (used in video) | DX0551 (used in video) |
| | PX4095 (used in video) | DX1887 (used in video) |
| | Joint Clip Report of Sam Temes - Google | |
| | | |
| Jon Resnick - IQVIA | PX1031 | DX0037 |
| | PX1100 | Jon Resnick Demonstrative (D-RESNICK-DEMO-1) |
| | PX1295 | |
| | PX1538 | |
| | PX1540 | |
| | PX1596 | |
| | PX1598 | |
| | PX1735 | |
| | PX1785 | |
| | PX4160 | |
| | | |
| Dr. Anupam Jena – Defendants’ Expert | PX0583 | Anupam B. Jena Demonstrative (D-JENA-DEMO-1) |
| | PX6503 | |
| | PX1032 | |
| | PX1402 | |
| | PX1596 | |
| | PX1973 | |
| | PX2826 | |
| | | |
| Various dates | | |
| Frank Lin, Jon Resnick | | Magnetic Board (D-IQVIA-DEMO-2) |

Exhibits

| Day 1 - 11/20/2023 | FTC | Defendants |
|---------------------------|------------|-------------------|
| Justin Freid | | DX0049 |
| CMI | | |
| | | |
| | | |
| Konrad Gerszke | | DX0066 |
| Pulsepoint | | DX1852 |
| | | DX1924 |
| | | DX1928 |
| | | DX1929 |
| | | |
| | | |
| Day 2- 11/21/2023 | | DX1664 |
| David Leitner | | |
| Klick | | |
| | | |
| Michael Colarossi | PX1625 | |
| IQVIA | PX1628 | |
| | PX1901 | |
| | | |
| Frank Lin | PX1026 | DX0583 |
| IQVIA | PX1126 | |
| | PX1254 | |
| | PX1284 | |
| | PX1962 | |
| | PX1981 | |
| | PX2775 | |
| | PX2779 | |
| | PX2780 | |
| | | |
| Ross Sandler | PX2736 | |
| DeepIntent | PX2750 | |
| | | |
| Day 3- 11/22/2023 | | |
| Mark Brosso | | |
| PurpleLab | | |
| | | |
| Jay Margolis | PX0008 | PX1091 |
| Former IQVIA | PX1259 | DX0082 |
| | PX1349 | DX0083 |
| | PX1377 | |
| | | |
| Day 4- 11/27/2023 | | |
| Greg Field | DX0581 | DX0103 |
| IQVIA | DX0675 | DX0581 |
| | PX1062 | DX0617 |
| | PX1064 | DX0660 |

| Day 1 - 11/20/2023 | FTC | Defendants |
|--------------------|--------|------------|
| | PX1069 | DX0667 |
| | PX1433 | DX0675 |
| | PX1439 | DX0677 |
| | PX1450 | DX0678 |
| | PX1451 | DX0753 |
| | PX1606 | DX0764 |
| | PX5152 | DX2033 |
| | PX5156 | DX2035 |
| | PX5286 | |
| | | |
| | | |
| Asaf Evenheim | PX0081 | DX0115 |
| Veeva | | DX1993 |
| | | DX2020 |
| | | DX2021 |
| | | DX2042 |
| | | DX2059 |
| | | |
| | | |
| Chris Paquette | PX2507 | DX0220 |
| IQVIA | PX2508 | DX0332 |
| | PX2515 | DX0373 |
| | PX2519 | DX2034 |
| | PX2520 | PX2509 |
| | PX2559 | PX2507 |
| | PX2804 | PX2508 |
| | PX2809 | PX2515 |
| | PX2812 | PX2520 |
| | PX2816 | PX2809 |
| | PX2847 | PX2812 |
| | PX5121 | |
| | PX5174 | |
| | | |
| Day 5- 11/28/2023 | | |
| Khara Hutchinson | | |
| Bayer | | |
| | | |
| Baron Harper | PX1733 | DX0510 |
| The Trade Desk | PX4083 | DX0518 |
| | PX4086 | DX0528 |
| | | DX0614 |
| | | DX1604 |
| | | DX2091 |
| | | DX2092 |
| | | DX2093 |
| | | DX2094 |
| | | DX2097 |
| | | DX2098 |

| Day 1 - 11/20/2023 | FTC | Defendants |
|----------------------------|------------------------|--------------------------|
| | | DX2099 |
| | | DX2100 |
| | | DX2101 |
| James Lawson | PX4088 | |
| AdTheorent | | |
| | | |
| Kostis Hatzitaskos | | |
| FTC Expert | | |
| | | |
| Day 6 - 11/29/2023 | | |
| Kostis Hatzitaskos (Cross) | | DX0066 |
| FTC Expert | | DX0074 |
| | | DX0078 |
| | | DX1703 |
| | | DX1889 |
| | | DX1924 |
| | | DX1929 |
| | | DX2020 |
| | | DX2035 |
| | | DX2059 |
| | | DX2069 |
| | | FTC Complaint |
| | | Hearing Transcript Day 1 |
| | | |
| Andrea Palmer | | |
| Publicis | | |
| | | |
| Yael Hochberg | | |
| Defendants' Expert | | |
| | | |
| Justin Chase | PX2938 (used in video) | |
| Eversana | | |
| | | |
| Paul Chachko | PX4160 (used in video) | |
| Throtle | | |
| | | |
| Day 7- 11/30/2023 | | |
| Mark Israel | PX0572 | |
| Defendants' Expert | PX1024 | |
| | | |
| Arif Nathoo | Video | |
| Komodo | | |
| | | |
| Andrew Kress | | |
| HealthVerity | | |
| | | |
| Day 8- 12/1/2023 | | |
| Sam Temes | PX0009 (used in video) | |

| Day 1 - 11/20/2023 | FTC | Defendants |
|--------------------|------------------------|------------------------|
| Google | PX4090 (used in video) | DX0548 (used in video) |
| | PX4092 (used in video) | DX0551 (used in video) |
| | PX4095 (used in video) | DX1887 (used in video) |
| | | |
| | | |
| Jon Resnick | PX1031 | DX0037 |
| IQVIA | PX1100 | |
| | PX1295 | |
| | PX1538 | |
| | PX1540 | |
| | PX1596 | |
| | PX1598 | |
| | PX1735 | |
| | PX1785 | |
| | PX4160 | |
| | | |
| Dr. Anupam Jena | PX0583 | |
| Defendants' Expert | PX6503 | |
| | PX1032 | |
| | PX1402 | |
| | PX1596 | |
| | PX1973 | |
| | PX2826 | |

Demonstratives

| Date | Party | Demonstrative | Description | Witness |
|-------------|--------------|----------------------------|--|--------------------|
| 11/20/2023 | FTC | | FTC Opening | NA |
| 11/20/2023 | Defendant | D-IQVIA-DEMO-1 | Defendants' Opening | NA |
| 11/20/2023 | Defendant | D-FREID-DEMO-1 | WPP Annual Report & Accounts 2022 | Justin Freid |
| 11/20/2023 | Defendant | D-FREID-DEMO-2 | DSPs Used by CMI | Justin Freid |
| 11/20/2023 | Defendant | D-GERSZKE-DEMO-1 | Pulsepoint slides | Konrad Gerszke |
| 11/21/2023 | Defendant | D-LIN-DEMO-1 | CMS.gov | Frank Lin |
| 11/21/2023 | Defendant | D-LIN-DEMO-2 | CMS.gov | Frank Lin |
| 11/21/2023 | Defendant | D-LIN-DEMO-3 | DMD HCP Audience Partners | Frank Lin |
| 11/21/2023 | Defendant | D-LIN-DEMO-4 | IQVIA HCP Audience Partners | Frank Lin |
| 11/21/2023 | Defendant | D-LIN-DEMO-5 | Stages Of Programmatic Advertising | Frank Lin |
| 11/21/2023 | Defendant | D-LIN-DEMO-6 | Different Types of Advertising Inventory | Frank Lin |
| 11/21/2023 | Defendant | D-LIN-DEMO-7 | Providers of Opted-In HCP Data | Frank Lin |
| 11/22/2023 | Defendant | D-MB-1 | HCP/DTC/Measurement - PurpleLab | Mark Brosso |
| 11/22/2023 | Defendant | D-MB-2 | DSPs - PurpleLab | Mark Brosso |
| 11/22/2023 | Defendant | D-MB-3 | Data Companies - PurpleLab | Mark Brosso |
| 11/22/2023 | Defendant | D-MB-4 | PurpleLab Everywhere | Mark Brosso |
| 11/22/2023 | Defendant | D-MB-5 | PurpleLab Timeline - Edits | Mark Brosso |
| 11/22/2023 | FTC | FTC - Purple Lab Timeline | Purple Lab Timeline | Mark Brosso |
| 11/22/2023 | FTC | FTC Margolis Demonstrative | FTC Margolis Demonstrative | Jay Margolis |
| 11/27/2023 | Defendant | D-DEMO-CP-1.pptx | Chris Paquette - DeepIntent Product Offerings | Chris Paquette |
| 11/27/2023 | Defendant | D-VEEVA-DEMO-1 | Table of Top Participants in IQVIA's TPA Program 2018-2023 | Asaf Evenhaim |
| 11/28/2023 | Defendant | D-BAYER-DEMO-1 | Bayer Low Dose Aspirin Demonstrative | Khara Hutchinson |
| 11/28/2023 | Defendant | D-BAYER-DEMO-2 | Children's Claritin Demonstrative | Khara Hutchinson |
| 11/28/2023 | Defendant | D-BAYER-DEMO-3 | MiraLAX Demonstrative | Khara Hutchinson |
| 11/28/2023 | FTC | FTC - ELMO Demo re Figures | FTC - ELMO Demo re Figures | Kostis Hatzitaskos |

| Date | Party | Demonstrative | Description | Witness |
|---------------|--------------------------------|---------------------------------------|---|------------------------|
| 11/28/2023 | FTC | FTC Demonstratives_Kostis Hatzitaskos | FTC Demonstratives_Kostis Hatzitaskos | Kostis Hatzitaskos |
| 11/29/2023 | Defendant | Dr. Hatzitaskos' | | |
| demonstrative | Dr. Hatzitaskos' demonstrative | Kostis Hatzitaskos | | |
| 11/29/2023 | Defendant | D-HOCHBERG-DEMO-1 (C) | Yael Hochberg Demonstratives (Confidential) | Yael Hochberg |
| 11/29/2023 | Defendant | D-HOCHBERG-DEMO-1 (NC) | Yael Hochberg Demonstratives (Not Confidential) | Yael Hochberg |
| 11/30/2023 | Defendant | D-ISRAEL-DEMO-1 | Dr. Mark A. Israel's demonstrative | Mark A. Israel |
| 11/30/2023 | FTC | FTC Dr. Israel Cross Examination | FTC Dr. Israel Cross Examination | Mark A. Israel |
| 12/1/2023 | Defendant | D-JENA-DEMO-1 | Anupam B. Jena Demonstrative | Anupam B. Jena |
| 12/1/2023 | Defendant | D-RESNICK-DEMO-1 | Jon Resnick Demonstrative | Jon Resnick |
| Various dates | Defendant | D-IQVIA-DEMO-2 | Magnetic Board | Frank Lin, Jon Resnick |

Clip Reports

| Date | Party | Description | Witness |
|-------------|--------------|---|-------------------|
| 11/21/2023 | FTC | Clip Report of Ekaterina Karlova - EMD Serono | Ekaterina Karlova |
| 11/22/2023 | Defendants | Clip Report of William Veltre - BMS | William Veltre |
| 11/29/2023 | Defendants | Clip Report of Paul Chachko - Throtle | Paul Chachko |
| 11/30/2023 | Defendants | Clip Report of Justin Chase - Eversana | Justin Chase |
| 11/30/2023 | FTC | Clip Report of Arif Nathoo - Komodo | Arif Nathoo |
| 12/1/2023 | Defendants | Clip Report of Sam Temes - Google | Sam Temes |

Dated: December 7, 2023

Respectfully submitted,

/s/

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/s/

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Evan M. Harris (pro hac vice)
Andrew J. Molina (pro hac vice)
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